REMARKS

Claims 1-19 are pending in the present application. By this reply, new claims 12-19 have

been added. Claims 1 and 6 are independent.

35 U.S.C. § 103 Rejection

Claims 1, 2, 5-8, 10 and 11 have been rejected under 35 U.S.C. § 103(a) as being

unpatentable over Benjamin et al. (U.S. Patent No. 6,113,208) in view of Helterline et al. (U.S.

Patent No. 6,039,430). This rejection is respectfully traversed.

Regarding independent claim 1, the Examiner states that Benjamin et al. discloses the

claimed feature of "storing the set of printing parameters, which is adapted to a specific

functional component of the printer, in a storage device addressable over the Internet at a

predetermined URI...; and when the printer is to be configured, getting access to said URI, and

downloading the set of printing parameters", and cites column 3, line 31 to column 4, line 15 of

Benjamin et al. to support his assertion.

At a closer look, however, Benjamin et al. does not teach or suggest such claimed

features. Benjamin et al. at column 3, lines 31-35 discloses that the memory chip 20 on the ink

cartridge 14 includes parameters recorded therein, some of which are specifically derived for use

with the specific ink contained within the cartridge 14 and others of which are employed for

control of the ink printer 1. That is, the memory chip on the ink cartridge 14 itself includes

parameters for the control of the ink printer 1 and thus, there is no disclosure of downloading

printing parameters from a website to the printer as in Applicant's invention.

On the other hand, Benjamin et al. discloses downloading a new printer driver using the data read from the memory cartridge. However, downloading <u>drivers</u> is known in the art. A driver is something completely different from printing parameters used in the printer. Driver software is software that is installed on a host computer, external to the printer, for driving the printer by application programs on the host computer. It runs on an environment different from that of the printer. And since this environment may change, e.g., the operating system and the host computer are updated, a new version of the printer driver is released. And most of the time, manufactures make available such new versions of driver software over the Internet so that users can install them on the host computer.

Further, in Benjamin et al., the printer driver is downloaded to the <u>host</u> computer, whereas in Applicant's invention, printing parameters (not the driver) are downloaded to the <u>printer</u> itself.

The present invention is advantageous over Benjamin et al. because the present invention allows the printing parameters (that are coupled to a certain functional component of a printer) to be downloaded from a central repository, for example, via a URI, and such downloading can be made at the moment the functional component is installed. This allows configuration and re-configuration of the printer in which functional components are installed or updated to be easily accomplished.

Similar arguments apply to independent claim 6 that recite similar features as claim 1 in a varying scope.

Furthermore, Helterline et al. does not overcome these deficiencies of Benjamin et al. since Helterline et al. merely discloses storing operational parameters in the controller 26. Therefore, even if the references were combinable, assuming *arguendo*, the combination of references would still fail to teach or suggest at least the above noted features recited in independent claims 1 and 6.

As an alternative, regarding dependent claim 5 (and claim 7 reciting similar features in a varying scope), the combination of references fails to teach or suggest "detecting by the control unit whether a functional component has been interchanged; and if so, initiating a download of a new set of printing parameters pertinent to the new functional component" recited in claim 5. In Applicant's invention, if the control unit detects change in the functional component, downloading of new printing parameters is initiated automatically. In direct contrast, in Benjamin et al., the initiation of downloading is manually performed since only the website address is given on the display screen 44 of the host processor 10, and the user would have the opportunity to use the given website address to download the printer driver.

Accordingly, independent claims 1 and 6 and their dependent claims are patentable over the applied references, and reconsideration and withdrawal of the rejection based on these reasons are respectfully requested.

Claims 3 and 4 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Benjamin et al. in view of Helterline et al. further in view of Siwinski et al. (U.S. Patent No. 6,938,976). Claim 9 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over

Benjamin et al. in view of Helterline et al further in view of Goto (U.S. Patent Application Publication 2001/0047514). This rejection is respectfully traversed.

As discussed above, the combination of Benjamin et al. and Helterline et al. does not teach or suggest at least the above noted features recited in independent claims 1 and 6 from which claims 3-4 and 9 depend. Furthermore, neither Siwinski et al. nor Goto corrects these deficiencies in the Benjamin et al.-Helterline et al. combination. Accordingly, independent claims 1 and 6 are patentable over the applied references, and claims 3-4 and 9 are also allowable due to the dependency on the independent claims. Accordingly, the rejections are improper and should be withdrawn.

New Claims

Claims 12-19 further define the invention as set forth in independent claims 1 and 6 and are thus allowable at least for the same reasons that their independent claims are allowable as discussed above. Accordingly, indication of allowance of the new claims is respectfully requested.
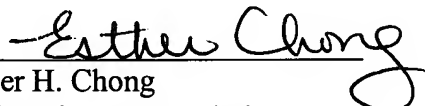
CONCLUSION

For the foregoing reasons and in view of the above clarifying amendments, the Examiner is respectfully requested to reconsider and withdraw all of the objections and rejections of record, and to provide an early issuance of a Notice of Allowance.

EHC/sld

Should there be any outstanding matters which need to be resolved in the present

application, the Examiner is respectfully requested to contact Esther H. Chong (Registration No.

40,953) at the telephone number of the undersigned below, to conduct an interview in an effort to

expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and further

replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any

additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17; particularly, extension

of time fees.

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Respectfully submitted,

By   Esther Chong

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